

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

BROCK FREDIN,

Plaintiff,

--against--

LINDSEY MIDDLECAMP,

Defendants.

District Court Case No. 17-CV-3058
(SRN)

NOTICE OF MOTION

BROCK FREDIN,

Plaintiff,

--against--

GRACE MILLER,
CATHERINE SCHAEFER,

Defendants.

District Court Case No. 18-CV-466
(SRN)

NOTICE OF MOTION

BROCK FREDIN,

Plaintiff,

--against--

JAMIE KREIL,

Defendant.

District Court Case No. 20-CV-01929
(SRN)

NOTICE OF MOTION

TO: Karl Johann Breyer
Kutak Rock
60 South 6th St, #3400
Minneapolis, MN 55402
Counsel for Defendants Lindsey Middlecamp, Grace Miller, and Catherine Schaefer

Anne M. Lockner
Robins Kaplan, LLP
8000 Lasalle Ave
Minneapolis, MN 55402
Counsel for Defendant Kreil

TAKE NOTICE that as soon as the Court deems proper, or as soon as can be heard, Plaintiff Brock Fredin will move the Court for an order:

1. Sanctioning Defendants and their counsel Robins Kaplan and Kutak Rock pursuant to Fed. R. Civ. Proc. Rule 11 (b) and (c).
2. Verification and acknowledgements:
 - a) The information contained in this document and the enclosed Memorandum of Law is true and correct to the best of my knowledge;
 - b) I have not been determined by any court to be a frivolous litigant and I am not the subject of an order precluding me from serving or filing this document;
 - c) I am not serving or filing this document for any improper purpose, such as to harass the other party or to cause delay or needless increase in the cost of litigation or to commit a fraud on the court; and

- d) I understand that the court can order me to pay money to the other party, including the reasonable expenses incurred by the other party if the above statements are not true.

The grounds for this motion are as stated in the attached Memorandum of Law.

Dated: January 3, 2022
Saint Croix Co., WI



s/ Brock Fredin

Brock Fredin

Saint Croix Co., WI 54002

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Plaintiff, Pro Se